

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CONSUMER FINANCIAL
PROTECTION BUREAU,

Petitioner,

v.

NATIONAL CREDIT SYSTEMS,
INC.,

Respondent.

Case No. 1:23-MI-7-WMR

JOINT STATUS REPORT

Petitioner Consumer Financial Protection Bureau (“Bureau”) and Respondent National Credit Systems, Inc. (“NCS”) (together, the “Parties”) submit this Joint Status Report to notify the Court of developments relevant to the stay of this action and to request an extension of the stay.

After the Parties conferred on May 21, 2024, NCS agreed to respond to the Bureau’s October 2022 Civil Investigative Demand (“CID”) by no later than July 12, 2024. Due to technical issues that were jointly addressed, the Bureau did not receive NCS’s production until July 19, 2024.

On August 8, 2024, the Bureau notified NCS of deficiencies in its responses to Interrogatory Nos. 2, 3, 5-7, 15, and 16; Request for Written Report Nos. 2 and

3; and Document Request Nos. 4, 5, 7, 8, 11-14, 21, 24, and 26. NCS produced information in response to the Bureau's August 8 deficiency e-mail on August 20, 2024.

As the Bureau continued to review NCS' responses, the Bureau became aware of additional deficiencies. On August 20, 2024, the Bureau notified NCS of deficiencies in its responses to Request for Written Report Nos. 1, 4, 6-11 and Document Request Nos. 16 and 17. The Parties conferred on August 26, 2024, regarding the Bureau's August 20 deficiency e-mail. However, this conference was suspended to permit NCS additional time to prepare for discussions, including conferring with relevant persons regarding its data retention and production methods.

The Parties, therefore, respectfully request that the Court further extend the stay of any briefing or decision on the Bureau's motion to enforce the CID to permit NCS to completely produce any outstanding responsive information and the Bureau to review NCS's supplemental productions.

The Parties respectfully request that the Court amend the deadlines in its October 18, 2023 Order (Doc. 011), as modified by its May 29, 2024 Order (Doc. 013) and its July 26, 2024 Order (Doc. 015), to extend the stay of proceedings in this case until October 9, 2024, and reschedule NCS's deadline to file a response to the motion to enforce the CID (Doc. 001) (if necessary) to October 16, 2024.

Dated: August 28, 2024

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Respectfully submitted,

CONSUMER FINANCIAL
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing memorandum complies with the type requirements of Local Rule 5.1(C) because it was prepared in 14-point Times New Roman font.

/s/ Sarah Baldwin
Sarah Baldwin